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Filing Date	March 18, 2006
First Named Inventor	Narayan P. Menon
Art Unit	2661
Examiner Name	Cangialosi
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ENCLOSURES *(check all that apply)*

- ☐ Fee Transmittal Form
  - ☐ Fee Attached
- ☐ Amendment / Reply
  - ☐ After Final
  - ☐ Affidavits/declaration(s)
- ☐ Extension of Time Request
- ☐ Express Abandonment Request
- ☐ Information Disclosure Statement
  - ☐ PTO/SB/08
- ☐ Certified Copy of Priority Document(s)
- ☐ Response to Missing Parts/ Incomplete Application
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  - ☐ Declaration/POA
  - ☐ Response to Missing Parts under 37 CFR 1.52 or 1.53
- ☐ Drawing(s)
- ☐ Licensing-related Papers
- ☐ Petition
- ☐ Petition to Convert a Provisional Application
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- ☐ After Allowance Communication to TC
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- ☐ Proprietary Information
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SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

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Signature	
Date	January 15, 2008

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Our Docket No.: 42390P11564C2

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:	)	
	)	
Narayan P. Menon	)	Examiner: Backer, Firmin
	)	
Application No.: 10/803,374	)	Art Group: 3621
	)	
Filed: March 18, 2004	)	
	)	
For: Wireless Access Unit with Trunk Interface	)	
	)	

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REPLY BRIEF
IN SUPPORT OF APPELLANT'S APPEAL
TO THE BOARD OF PATENT APPEALS AND INTERFERENCES

Sir:

Applicant (hereinafter "Appellant") hereby submits this Reply Brief (hereinafter "Reply") in reply to the Examiner's Answer of November 15, 2007 and in further support of its appeal from a final decision by the Examiner, August 25, 2006, in the above-referenced Application. Appellant respectfully requests consideration of this appeal by the Board of Patent Appeals and Interferences (hereinafter "Board") for allowance of the above-captioned patent application.

An oral hearing is not desired.

ARGUMENT

A. Introduction

The Answer puts complete reliance on Figures 1and 2 and Table 1 of Sicher (Sicher, et al., U.S. Patent Publication No. 2001/0015968, hereinafter "Sicher"). This is an anticipation rejection. For anticipation, the reference must show each and every element recited in the claims. For the Board's convenience, this reply will be limited to Claim 1.

B. Trunk Interface Unit.

The Examiner points to Figure 2, item 14, the E-IWF. In Claim 1, the trunk interface unit has a plurality of subscriber ports and each port is coupled to a trunk of a central telephone switch. As can be seen from Fig. 1, the E-IWF is coupled to a Mobile Switching Center on the one hand and the Internet on the other. The Examiner mentions that Sicher allows a Mobile Subscriber 15 to connect to a landline terminal 12. However, paragraph 28 states that this connection to a landline terminal is "via an IP-based network (for example, the Internet) without going through the PSTN..." So there is no central telephone switch, only an MSC.

As to the ports, these are also not shown.

C. Subscriber Line Interface Cards (SLICs)

The Examiner has found the SLICs in Table One which mentions NICs (Network Interface cards). The table would appear to be saying that NICs of various kinds are used as a data link for electronic mail application. The term does not appear elsewhere in the

text. First a SLIC is a specific term with a specific meaning in telecommunication and a SLIC is not a NIC. Accordingly, this mention in the table cannot anticipate the reference.

Second, in Claim 1, each SLIC is coupled to a subscriber port to provide loop interface functions to the central telephone switch. There is no mention of providing loop interface functions in Sicher and there is no central telephone switch. Loop interface is another specific term with a specific meaning in telecommunication. The description of Figure 2 at paragraphs 30-35 discusses a variety of different protocols and transcoding, but does not mention loop interface. It would appear that the E-IWF and the MSC are either specifically designed to work together or that any need for loop interface is outside the scope of the Sicher invention.

D. Subscriber Interface Modules

The examiner appears to have ignored this express limitation of the claims. Claim 1 recites "a subscriber interface module associated with each subscriber line interface card."

E. Radio Transceiver

Claim 1 includes a radio transceiver to communicate with a wireless cellular communications network using a wireless trunk. There are two transceivers in Sicher. One, RBS 16, is connected to the MSC using a wired trunk. The other, MS 15 is a mobile telephone. The wireless cellular communications network in Sicher, however is the RBS and MSC, thus this limitation can only be read onto the mobile subscriber 15. This causes problems for reading the rest of the claim onto Sicher.

F. Control Section

The Examiner would appear to argue that control is being exerted through UDP or TCP and accordingly, there is a control section in an unstated location. This argument is far from enough to support anticipation. The control section element has several explicit recitations.

First there are physical limitations. The control section, according to Claim 1 is coupled to each subscriber line interface card, to each of the subscriber interface modules, and to the radio transceiver. The undefined, not shown, control section of Sicher cannot be coupled to the NICs of the E-IWF (it is not clear where the NICs are in Sicher) and also to the radio transceiver, MS 15.

Second, there are functional limitations. The control section is to receive voice and signaling from each of the subscriber line interface cards to package and format the received voice and signaling for the wireless communications network and, using the subscriber interface modules, to coordinate and control over the air protocols of the wireless communications network. The Examiner refers to UDP and TCP, but these cannot be used for the over-the-air protocols between RBS and MS (the only wireless link in Sicher. Further there is no control entity that operates between the MSC and E-IWF and also between the MSC and RBS. The Examiner again has not shown the teachings that are required for anticipation.

G. Wireless Access Communication Unit

The Examiner points to no teaching that might suggest the wireless access communications unit of Claim 1. This element is to route calls from user stations coupled to the central telephone switch to the wireless cellular communications network

in response to a command received from the central telephone switch. Sicher simply has no similar element because Sicher does not route calls from user stations through a switch to a wireless cellular communications network. Sicher routes calls from Internet Voice over IP terminals to a wireless cellular communications network. There is not central telephone switch and there are no commands from a central telephone switch. Instead there are Internet packets received at a server, the E-IWF.

H. Sicher is directed to a different problem and solves it in a different way.

Fundamentally Sicher is trying to connect Internet Voice over IP terminals 12 to cell phones 15 through Sicher's E-IWF wired to an MSC. The present application connects telephone terminals 102 to the outside telephone infrastructure through a wireless access communications unit 106 that has a wireless connection to the cell phone infrastructure 109, 112, 115, 116, 120, 123 (See Figure 1). This difference is brought out in the claims where the switch, the SLICs, the loop interface and the wireless trunk are all specifically spelled out. It would not be possible to provide these functions using Sicher.

I. CONCLUSION

For these reasons, Appellant respectfully submits that all appealed claims in this application are patentable and were improperly rejected by the Examiner during prosecution before the United States Patent and Trademark Office. Appellant respectfully requests that the Board of Patent Appeals and Interferences overrule the Examiner and direct allowance of the rejected claims.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Dated: January 15, 2008

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